

Joshua Koltun ATTORNEY

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Attorney for Third Party Witnesses
Below the Blue,
Marine Taxonomic Services, Ltd,
Seth Jones, and Monique Rydel-Fortner

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

CALIFORNIA SPORTFISHING
PROTECTION ALLIANCE,

Plaintiff,

v.

PACIFIC BELL TELEPHONE COMPANY

.....Defendant

Case 2:21-cv-00073-JDP

**MOTION TO PARTIALLY
RECONSIDER ORDER TO COMPEL
AND FOR PROTECTIVE ORDER**

Filed herewith:

Memorandum in Support
Declaration of Seth Jones
Declaration of Joshua Koltun
[Proposed] Order

Date: January 25, 2024

Time: 10 am

Courtroom: 9 (via Zoom)

Judge: The Hon. Jeremy D. Peterson

Joshua Koltun ATTORNEY

1 TO ALL COUNSEL OF RECORD:

2 PLEASE TAKE NOTE that on January 25, 2024, at 10 am in Courtroom 9 and via Zoom, Third Party
3 Witnesses Below the Blue, Marine Taxonomic Services, Ltd, Seth Jones, and Monique Rydel-Fortner
4 (hereinafter collectively “BTB/MTS”) will and hereby do move the Court under Fed.R.Civ.P. 54(b)
5 and Local Rule 230(j) to partially reconsider its Order to Compel (DE 80), and for a Protective Order
6 under Fed.R.Civ.P. 26(c), whereby BTB/MTS shall be protected against producing documents or
7 disclosing information in connection with BTB/MTS assistance to the *Wall Street Journal* in
8 gathering news to disseminate to the public, or to the Environmental Defense Fund in publishing a
9 report to the public.

10 This motion is made upon the supporting Memorandum of Points and Authorities, on the
11 Declarations of Seth Jones and Joshua Koltun, on all pleadings and materials on file with the Court,
12 and all other such matters presented to the Court before the Motion is taken under submission.

13
14 Respectfully submitted,

15 January 4, 2024

16 _____ /s/

17 Joshua Koltun
18 Attorney for Third Party Witnesses
19 Below the Blue, Marine Taxonomic Services,
20 Ltd, Seth Jones, and Monique Rydel-Fortner
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